Meeting Minutes Travis Air Force Base Installation Restoration Program Restoration Advisory Board (RAB) Meeting Fairfield-Suisun Chamber of Commerce Fairfield, California 27 January 2000

RAB members present:

NAME	AFFILIATION	PRESENT
Brickeen, Allen	Travis Air Force Base, RAB co-chair	✓
Whalen, Jim N.	Mayor Fleming's office in Vacaville, RAB Community co-chair	✓
Job, Brad	Regional Water Quality Control Board	✓
Flores, Lalo	BDC Marine	✓
Kanouff, David F.	Nat'l Assn. of Retired Fed. Employees	✓
Lucey, John	U.S. Environmental Protection Agency	✓
Marianno, David	Suisun City Resident	✓
Peconom, John	U.C. Davis student	✓
Rued, Emily	Vacaville Unified School District	
Rundlett, John	Suisun City Council	✓
Salcedo, Jose	Department of Toxic Substances Control	✓
Taylor, William W.	Travis Unified School District	✓

Public Members present: None.

Agencies and Contractors present:

•	Glenn Anderson	Travis AFB
•	Wilford Day	Travis AFB
•	Dale Malsberger	Travis AFB
•	Kevin Jackson	Travis AFB
•	Mark Sandy	Travis AFB
•	Lonnie Duke	Travis AFB
•	Capt. Tadd Sholtis	Travis AFB
•	Kevin Neurer	Travis AFB
•	Christopher Hobbins	Air Force Center for Environmental Excellence
		(AFCEE)
•	David Cooper	U.S. EPA
•	Celeste Albanez	DTSC
•	Daryl Greenway	CH2M HILL
•	Wayne Williams	CH2M HILL
•	Peggy Taylor	CH2M HILL
•	Deena Stanley	Radian International
•	Joe Saxon	Radian International
•	Traci Bjers	Radian International
•	Mike Wray	IT
•	G. Watkin	ITSI
•	Randy Wheeler	Kleinfelder

Introduction, Welcome, and Introduction of Alternates

Mr. Allen Brickeen called the meeting to order. Mr. Brickeen introduced Capt. Sholtis, Travis AFB Public Affairs Officer. Mr. Brickeen announced that Ms. Nancy Jao and Mr. Richard Cameron have resigned from the Restoration Advisory Board (RAB).

Mr. Brickeen stated that the meeting format has been changed based upon comments received from the October 1999 RAB meeting. This format will give the public an opportunity to bring up topics and/or questions prior to any presentations. Topics of discussion will focus on issues that affect the progress of the cleanup program.

Approval of Minutes

The October 1999 RAB minutes were approved and finalized.

Additional Agenda Items or Questions from RAB/Public

Mr. Jim Whalen apologized to the Regional Water Quality Control Board (RWQCB) for not using the submitted article in the newsletter. Mr. Brickeen stated that the article will be featured in the next newsletter. Mr. Kevin Jackson stated that a copy of the charter was distributed for the RAB to review and determine if amendments would be appropriate or if

there should be a change in the business. This will be discussed at the April 2000 RAB meeting.

Discussion Topics

Off-Base Groundwater Cleanup

Mr. Mark Sandy, in response to an earlier question from Mr. David Marianno, "how come things take so long," presented a slide depicting the activities which took place at Fire Training Area 4 (FT005) from 1998 through 2000. Mr. Sandy explained in July 1999, funds were sent for access agreements to the Army Corps of Engineers (COE). On 7 September 1999, the funds were returned because the work was not and could not be contracted prior to the funds expiration.

Mr. Lucey asked why were the funds returned? Mr. Sandy answered that the funds would have expired at the end of the fiscal year on 30 September 1999. Mr. Brickeen further explained that if the funds cannot be spent or placed on contract, then the funds must be returned. The real estate funds go to the COE who must obtain a real estate agreement within the time frame.

Mr. Marianno asked what was the reason for the delay in receiving the funds? Mr. Brickeen answered that Travis AFB has received funds for 2 projects, real estate work for COE and for the Groundwater Sampling Analysis Program (GSAP). Funding did not come from the Pentagon until very late in the year because of various issues, which resulted in a longer waiting period for Travis AFB to receive the funds. Mr. William Taylor commented that a delay is not unusual for public agencies and other organizations.

Mr. Marianno asked do we have any funds this year? Mr. Brickeen answered yes, that the COE received funds 18 January 2000.

Mr. Sandy stated that another type of constraint that delays cleanup is the construction season or an access season where sampling is required. This period typically includes the dry months, April through November.

Mr. Marianno asked if the Air Force is negotiating an access agreement with the property owner south of SS030? Mr. Brickeen stated that a 50-year easement agreement has been offered to the property owner. Mr. Sandy commented that the agreement would include a one-time cash payment; previous leases were paid yearly.

Mr. Brickeen stated that the property owner is currently reviewing the offer. The easement allows assess to perform periodic sampling and maintenance at the wells. There will be little impact to the property because the pipes are underground and the wells are flush with the ground surface.

Mr. Lucey asked for clarification on the small portion of funding that was received prior to September 1999. Mr. Brickeen stated that a large percent of the funds were returned because the base was not able to obtain real estate agreements. The main delay at FT005 was getting

access to the property. Also the property owner limited the amount of samples taken at a time. The sample limit did not allow us to completely identify the plume boundary.

Mr. Sandy stated that as a result of the delays in remedial action implementation at FT005, data shows that the plume is either continuing to expand or the known area of the plume is increasing in size due to greater sampling sensitivity. Additional monitoring wells will be installed when the long-term access is finalized. – At this time, the major portion of the plume is being captured by the existing on-base extraction wells.

Mr. Brickeen commented that when the Air Force started "pulling" hard on the plumes at SS030 and SS029, it caused the northern end of FT005 to pull water to the west away from the FT005 extraction system at the base boundary. Travis AFB has requested funds this year to install additional extraction wells to stop the plume from migrating to previously uncontaminated areas.. These funds should be received by next month and wells installed by next summer.

Mr. Taylor asked where if there is a trench near FT005? Mr. Sandy answered no, the Air Force has what is considered a "picket fence" at that location consisting of three vertical extraction wells; however, there are some potential escape routes on either side.

Mr. Lucey commented that the interceptor trench is a horizontal trench to cut off the off-base contamination. Wells located at FT005 are designed to do the same. The Air Force designed the extraction well locations to capture the plume as best as they could and it appears that the placement does not allow total plume capture.

Mr. Sandy showed an informative slide, which gave the amounts of water treated, the flow of water (gallons per minute), total volatile organic compounds (VOCs) removed, and the amount of VOCs removed during the month for the Central Groundwater Treatment Plant, the South Base Boundary Groundwater Treatment Plant, and the North Ground Water Treatment Plant.

Mr. Whalen asked with regard to the existing drainage system, if the seasons have any affect on what the wells are capturing. Mr. Sandy answered that there may be a variance of between 10 and 15% in the water table surface below ground surface, however this doesn't translate into increased or decreased plume capture.

Mr. Brickeen commented that the interceptor trench at SS030 is working well.

WABOU Soil Record of Decision Progress

Mr. Anderson gave an update on the progress of the draft WABOU Soil Record of Decision (ROD). The draft document has been out since June 1998.

Major Issues to be Resolved

Mr. Anderson stated that the following are major issues to be resolved:

- Cleanup levels are still being negotiated. There has been a revised approach that uses
 the risk assessment to decide whether a site warrants a cleanup action. This will take
 into account cancer risk, non-cancer risk, ecological risk, and groundwater protection.
 Travis AFB will submit revised cleanup tables by mid-February 2000, assuming all
 inputs are received for final agreement.
- The institutional controls have generally been agreed upon. Institutional controls will address how the base will assure that human health and the environment are protected from low level contamination that is left in-place at a site. Institutional controls are protective based upon current land use.
- No progress has been made on the corrective action management unit (CAMU). At this time the proper name has not been decided upon by the agencies. The legal requirements will be based upon what this area is called. (Mr. Salcedo stated that he just received word today that DTSC has agreed to this area being referred to as a CAMU.) Mr. Lucey stated that U.S. EPA's attorney has agreed to call the temporary soil storage area a temporary CAMU. Mr. Anderson stated that the agencies have work ahead of them to resolve the issue. Mr. Lucey said the attorneys need to converse.

Mr. Marianno asked where the dirt will be placed? Mr. Anderson answered that the dirt will be placed near the northern landfill (LF007). An area will be set aside to temporarily store soil from the western portion of Travis AFB. This soil will then be used as part of the foundation layer for the cap at LF007.

Mr. Lucey stated that the Air Force presented a soil proposed plan for both operable units approximately a year ago. The CAMU was first brought before the public in the proposed plans. There were questions raised about the level of contamination, design type, etc. The Air Force will have another public meeting discussing the CAMU disposal levels along with other issues. Mr. Brickeen stated that a fact sheet will be distributed and discussed at the RAB.

Mr. Lucey went on to say that there will be a separate public comment period with a separate public meeting, which may coincide with the RAB meeting.

Minor Issues to be Resolved

• Travis has an active skeet range. It was temporarily closed down during the remedial investigation. It was reopened in 1997. The RWQCB became aware that lead shot from skeet range activities was falling into a water body (vernal pool); this does not comply with regulations. A letter was issued by the Water Board ordering the base to stop allowing lead shot and oil-based clay pigeon from falling into the water body. Travis AFB temporarily closed the range and began negotiations with the agency to resolve the short- and long-term future of the range. It was agreed that Travis AFB skeet range will change to an environmentally friendly-type clay pigeon and only allow steel shots for the short-term and develop a plan for long-term use.

Mr. Anderson stated that Travis AFB has proposed to the agencies to remove the skeet range from the ROD and treat it as a separate site.

Mr. Taylor asked if the Air Force has considered moving the skeet range? Mr. Anderson stated that it is an option. Other options are to remove the vernal pool and create a new vernal pool in another area.

• Reservoir Facilities 1514 and 1518 are water storage and water treatment facilities. The chemical used was hydrofluosilicic acid (fluoride) to fluoridate the water. During the risk assessment, it was found that the level of fluoride in the soil does not pose a risk to human health, thus does not warrant cleanup action. The WABOU groundwater interim record of decision (IROD) addresses groundwater at this site as a compliance project, since the leak took place after 1984 (the cutoff for Air Force restoration funds). U.S. EPA no longer considers the Travis AFB approach to address fluoride in groundwater acceptable (treating it as a compliance issue).

Mr. Lucey asked what was the proposed remedy in the soil ROD? Mr. Anderson answered to transfer it to the compliance branch that would decide what the most appropriate action would be. It appears the most appropriate action would be to allow natural attenuation to occur, install monitoring wells, and determine when this contaminant acts as a beneficial agent. If this site is in the compliance branch, it would be handled much more quickly.

Mr. Lucey stated that the U.S. EPA does not care who pays for the cleanup. It is a matter of the cleanup taking place and having site closeout. The rationale for transferring this site to the compliance branch is from an Air Force funding standpoint. Mr. Brickeen stated that according to the IROD, this site was to fall out of CERCLA and be addressed under compliance as a RCRA site.

Mr. Lucey stated it is possible to defer a site through RCRA and pass an ongoing RCRA permit, a RCRA action. Mr. Brickeen stated that a RCRA permit does not exist for this site.

Mr. Lucey stated that he does not anticipate this issue delaying the ROD.

Sections Undergoing Review

Mr. Anderson stated that the following sections are under review:

- Section 5.4 (Temporary Soil Storage Area) provided on 10 January 2000
- Section 5.10 (RD/RA Implementation and Schedule) provided on 10 January 2000
- Section 5.11 (Documentation of Significant Changes) provided on 10 January 2000
- Revised Table II-3-2 (COCs, COECs, and potential risks at WABOU Soil Sites) —
 provided on 8 December 1999

• Building 916 PCB Technical Memorandum — provided on 5 October 1999

Other Outstanding Issues

Mr. Anderson stated that the Air Force received no comments on ecological issues when the WABOU Soil ROD was originally reviewed. The Air Force asked the agencies in July 1999 if they agreed with the approach in the ROD and actually had no comments. Travis AFB took the approach to protect special status, endangered species, etc., in order to prevent future problems from occurring. The agency comments were requested by 24 August 1999. DTSC and Water Board comments have been received.

Mr. Whalen stated that concerning the U.S. EPA's comments, the public is entitled to some type of answer in regards to the ecological issues. Mr. Whalen asked where are the comments from the U.S. EPA and why has it taken so long to get the comments back.

Mr. Lucey stated that the U.S. EPA did submit comments on the entire document. The bottom line is that Travis AFB has many sites that are contaminated with many types of contaminants. Depending on the site and contaminant, a cleanup level will be determined and the driver will be human health-based, exposure, or industrial scenarios for future land use. The other considerations are groundwater impacts. The U.S. EPA has an ecologist and toxicologist who review the numbers and decide if the proposed levels in the soil ROD are adequate. Some comments have been submitted. From the public standpoint, the agencies' job is to ensure that cleanup levels are protective for intended land use.

Mr. Lucey took exception to the statement "EPA comments due to Air Force on 24 August 1999", stating that the comments were not due until October and it gives the impression that the U.S. EPA has not done anything in this regard.

Mr. Lucey stated that there are State regulations for various species, which may be more or less stringent than the U.S. EPA's. The U.S. EPA may not have commented on specific ecological issues — there are a lot of the contaminants whose cleanup levels are based on health cleanup standards, some are ecological if there is a sensitive species.

Mr. Lucey explained that the U.S. EPA's toxicologist has been ill but is now in the process of reviewing the ecological approach. It appears that the approach and numbers are appropriate and it is close to being completed.

Mr. David Kanouff asked if a target date could be set or does this action item have to remain open ended? Mr. Lucey stated that the U.S. EPA is working as fast as possible. It is likely that the U.S. EPA will concur and may have the comments completed by 4 February 2000.

Groundwater Interim Record of Decision Update

Mr. Malsberger gave an update on the proposed revision to the groundwater IROD.

Mr. Malsberger gave an overview of selenium in groundwater. Selenium is a natural occurring mineral in this region. At the South Base Boundary Groundwater Treatment Plant the discharge of selenium has exceed the existing discharge limit to Union Creek.

In 1999, the water board had revised the regional discharge limit for metals from a concentration base to mass base. If this change were applied to Travis, the current discharge would not exceed the new limit.

Mr. Malsberger stated that the IROD currently refers to discharge limits that were in effect at the time the IROD was developed. Travis AFB will incorporate the 1999 limit for discharge of treated water to San Francisco Bay with the approval of the agencies. An update will be issued for the NEWIOU and WABOU IRODs. In addition to briefing the RAB, Travis AFB may be required to generate an Explanation of Significant Differences (ESD). An ESD is a document that explains the changes to the public and is considered necessary if the change is considered significant.

Mr. Malsberger stated that Travis AFB, RWQCB, and DTSC felt that the change was not significant and did not require an ESD; however, the U.S. EPA disagreed. In October 1999, Travis AFB requested that the U.S. EPA submit a letter stating its position in order to substantiate the additional, unplanned expense of producing an ESD.

Producing an ESD, would require the following:

- Summarize support agencies' comments in the ESD
- Publish a notice in the local newspaper
- Make the ESD available to the public via Administrative Record and Information Repository

According to U.S. EPA guidance, a formal public comment period is not required. However, it goes on to say that a comment period or public meeting may be held voluntarily on an ESD where there is considerable public interest.

Mr. Job stated that changing the discharge limits will result in Travis AFB being in compliance. It will not change the activities on base or the discharge. It will only change whether or not the RWQCB interprets the discharge being in or out of compliance. Mr. Job stated that he recommends this change because there are 100 other sites that are doing the exact same thing. Many of these sites have the same problem of low concentrations at background levels. This is why the RWQCB came up with this mass based method to measure the chemicals. Since the mass is small there is no threat associated with it.

Mr. Malsberger asked the RAB if they felt that there would be considerable public interest in this change.

Mr. John Rundlett asked how do you take selenium out of groundwater? Mr. Job answered that refineries have spent millions of dollars researching how to remove selenium from groundwater. One method is resin bed ion exchange, which is a special kind of plastic that attracts selenium and can be washed off with acid.

Mr. Taylor asked if Travis AFB was below the drinking water standards before this change? Mr. Malsberger answered it was. The actual limits that are established by the Water

Board are not only based on drinking water standards but also on the acceptable levels for the aquatic receptors.

Mr. Marianno asked what is the U.S. EPA's position? Mr. Lucey stated that one issue is "is the change a significant difference and does it require an ESD". The other issue is "should it go out to public comment; is there enough public concern to warrant a public comment period?"

Mr. Lucey asked if Travis AFB is the only facility being affected in the Bay Area? Mr. Job stated that the permit limits were changed in 1993.

Mr. Lucey asked if there were significant amount of public concern at the other sites? Mr. Job stated no. Mr. Job stated that there are two ways to obtain a permit to discharge water in the San Francisco Bay: (1) general permit and (2) individual permit. Individual permits are given to facilities that are potentially controversial and complex such as sewage treatment plants, refineries and large industries. General permits are given to noncontroversial facilities. To operate under a general permit a facility send in a notice of intent to discharge, a letter stating the intent to comply with the requirements of this general permit for the extraction and treatment of groundwater. It does not require an action from the Water Board.

Mr. Job commented that there is a philosophical issue; people could interpret this as what is called "backsliding" in environmental regulation. Meaning that there is a general philosophy that once there is a stringent limit in place, it should never be reduced. There is an aspect to the new discharge limits that it is less stringent than the previous permit. However, the RWQCB has reviewed the pros and cons and the potential cost for treatment of selenium would in many instances make groundwater cleanup so expensive, that it may not happen. So it becomes an issue of balancing economics.

Mr. Job commented that the water board would not allow the water quality to be impaired. It is his opinion that a good balance has been made in that concentrations are not in excess of the water quality rule and the potential cost in meeting the water quality rule are very high.

Mr. Williams asked has anybody else had a public hearing and a public period? Mr. Job stated that he was not aware of any superfund sites that have undergone an ESD for this; however, he stated that he is also unaware of any other superfund sites that have not been operating under the permit beforehand. If a facility is not a superfund site, this is the permit given.

Mr. Whalen stated that he felt that the administrative record and informational repositories would be adequate along with placing the changes within the newsletter.

Mr. Rundlett asked how other agencies deal with notifying the public? Mr. Malsberger answered that it depends on how much public involvement and concern there is.

Ms. Celeste Albanez stated that when changing a requirement to a permit or changing a document of decision there should be at least a public comment period.

Mr. Lucey stated that U.S. EPA Guidance should be followed along with having a 30-day public comment period and a public meeting. It would make sense to err on the side of caution rather than being secretive about what is being done. Mr. Brickeen stated that no one is being secretive. Mr. Taylor stated that he would be more concerned if there was a change in way that the groundwater was being processed. Travis AFB is just stating that it is not in violation.

Mr. Lucey stated that he could go either way with it. However, there seems to be a mindset when talking about a public comment period that there is a real barrier or resistance to it because of the effort it takes to do a public meeting. Mr. Brickeen stated that it is a lot of extra work and it takes time from other issues.

Ms. Albanez stated that the purpose of the comment period is to solicit input to assist in making a decision. In this instance, the comments will not have an impact.

Mr. Rundlett moved that the change be placed in the newsletter and if there are concerns to contact the base and decide later on if we want a public meeting. Mr. Taylor seconded. It was unanimously accepted.

Mr. Flores Lalo suggested placing the notification on the website. It was agreed upon.

Cleanup Program Status

Mr. Brickeen reported that West Treatment Transfer Plant (WTTP) testing will begin in two weeks. The North Treatment Plant (NTP) will startup within one month. Travis AFB is approximately \$10 million short in its cleanup program. Mr. Brickeen will campaign for additional funds from headquarter.

Regulatory Agency Reports/Comments

Mr. Job stated that the skeet range meeting was productive and Travis AFB took the news well.

Mr. Lucey stated that the agencies and Travis AFB are working diligently in finalizing the WABOU Soil ROD in order to begin the actual clean up work in the April timeframe. Mr. Lucey expressed concern about the amount of work that is to be done and the delays that will occur.

Mr. Anderson stated that a public meeting has been tentatively scheduled for 15 March 2000 to present proposed soil cleanup strategies that will be explained in a fact sheet. The public comment period is tentatively scheduled from 23 February 2000 to 24 March 2000.

Mr. Salcedo stated that DTSC is working with Travis AFB in getting the CAMU issue resolved. DTSC is also working with the U.S. EPA's attorney to discuss strategies.

Focus Group Reports

Community Relations Focus Group

Mr. Marianno reported that the Community Relations Focus Group met on 19 January 2000 at Marie Callender's Restaurant in Fairfield, California. Five out of seven RAB members attended along with three Travis staff participating. Mr. Marianno commented that it was an excellent meeting. Items discussed at the meeting were as follows:

- Public Participation committee will look for new ways to advertise the meetings.
- Restoration Advisory Board committee recommends to increase RAB to 20
 members and will use a combination of open recruiting from the public and
 appointments from specific organizations.
- Programs committee recommends continuing programs such as outreach programs, public speaking engagements at various organizations, IRP display set up at various information repositories, educational programs, and IRP site tour.
- Community Relations Media committee recommends that the *Community Relations Plan* be updated, continue the newsletter, expand the IRP website, and create a brochure to inform elected officials and public about the status of the cleanup program.

Relative Risk/Budget Focus Group

Mr. Brickeen reported that the Relative Risk/Budget Focus Group did not meet last quarter. No report.

Technical/Document Review Focus Group

Mr. Anderson stated that Mr. John Peconom provided comments on the Cypress Lakes Golf Course Removal Action Work Plan. Mr. Anderson stated that the comments were very helpful.

Meeting Issues

RAB/public question

Mr. Whalen requested that the focus groups provide their reports in writing for review, as did the Community Relations Focus Group. It was agreed upon.

The next RAB meeting will be on 20 April 2000.

Mr. Rundlett commented that he liked the new format.